

O'TOOLE SCRIVO

A LIMITED LIABILITY COMPANY

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May 2, 2025

Via CM/ECF

Hon. Andre M. Espinosa, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Courtroom MLK 2D
Newark, New Jersey 07101

**Re: New Wallington Home, LLC, et al. v. Borough of Wallington, et al.
Civil Case No.: 20-08178 (CCC) (AME)**

Dear Judge Espinosa:

This firm represents Plaintiffs in this matter. The parties recently appeared before Your Honor for a second settlement conference on April 17, 2025. While the parties are continuing to discuss settlement, the Court asked the parties to provide a proposed schedule to complete expert discovery by May 2, 2025. The parties have conferred and propose the following:

- (1) Plaintiffs' expert report(s) will be served by no later than June 30, 2025;
- (2) Defendants' expert report(s) will be served by no later than August 29, 2025; and
- (3) All expert depositions will be completed by October 13, 2025.

Plaintiffs will note that the time for issuance of Plaintiffs' expert report(s) is necessary because one of Plaintiffs' experts, Andy Beveridge, recently and suddenly passed away. As such, Plaintiffs are working to retain a new expert and will disclose such expert once they are formally engaged.

The parties jointly request that the Court enter the attached consent order memorializing this schedule. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ James DiGiulio
James DiGiulio

cc: All Counsel of Record (via ECF)